

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Civil No.
21 MC 101 (AKH)

THIS RELATES TO:
02 CV 7154 (AKH)

IN RE SEPTEMBER 11 LITIGATION

Bavis v. United Airlines, Inc., et al.

NOTICE OF MOTION

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PLEASE TAKE NOTICE that Defendants United Air Lines, Inc.; United Continental Holdings, Inc., (f/k/a UAL Corp.), (hereinafter “United); Huntleigh USA Corporation; ICTS International, N.V., Globe Aviation Services Corporation; and The Massachusetts Port Authority (collectively “Defendants”) will move this Court upon the accompanying Declaration of Jeffrey J. Ellis and Memorandum of Law, at a date and time to be set by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York, for an order (i) directing Plaintiff to fully comply with the Court’s prior directives and to provide clear, concise claim information; (ii) establishing an expedited briefing schedule for the standard of care and collateral estoppel

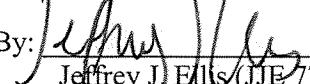
issues; or alternatively, (iii) granting reconsideration of United and Huntleigh USA Corporation's prior request for a damages-only trial.

Dated: December 8, 2010
New York, New York

Respectfully submitted,

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NOTICE OF MOTION

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To

Signature (Rule 130-1.1-a)

Print name beneath

Service of a copy of the within is hereby admitted.

Attorney(s) for

Dated:

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (*certified*) true copy of a
duly entered in the office of the clerk of the within named court on

NOTICE OF SETTLEMENT

that an order
will be presented for settlement to the HON.
within named Court, at

on at M.

Dated,

of which the within is a true copy
one of the judges of the

Yours, etc.

QUIRK AND BAKALOR, P.C.